

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

JOHN SCOTT MAAS,	*	
	*	
PLAINTIFF,	*	CIVIL ACTION NO. 20-00335
	*	
VERSUS	*	
	*	
BP EXPLORATION & PRODUCTION	*	JUDGE BARBIER
INC. AND BP AMERICA	*	
PRODUCTION COMPANY,	*	MAGISTRATE
	*	JUDGE CURRAULT
DEFENDANTS.	*	
	*	
Related to: 12-968 BELO	*	
in MDL No. 2179	*	
	*	

PARTIES' STATEMENT REGARDING VENUE

Pursuant to Section III(1)(A) of the Initial Proceedings Case Management Order (“CMO”), and as provided by Section VIII.G of the Medical Benefits Class Action Settlement Agreement (“MSA”), Plaintiff John Scott Maas and Defendants BP Exploration & Production Inc. and BP America Production Company (collectively, the “BP Parties”) stipulate that this Back-End Litigation Option (“BELO”) Lawsuit should, in accordance with the standards of 28 U.S.C. § 1404(a), be transferred to the United States District Court for the Middle District of Tennessee, the Northeastern Division, for further proceedings.¹

¹ The venue selection made herein is based on information provided by Plaintiff pursuant to the CMO and MSA. The BP Parties reserve all rights to seek to transfer venue if it is later determined that another forum would be more appropriate pursuant to 28 U.S.C. § 1404(a) or otherwise. The BP Parties do not concede that any other cases currently subject to the MDL proceedings in this Court should be transferred pursuant to 28 U.S.C. § 1404(a) or otherwise. The BP Parties also reserve all rights as to venue and timing of any transfer with respect to such other MDL cases and in other BELO Lawsuits.

Date: August 21, 2020

Respectfully submitted,

/s/ John Scott Maas

John Scott Maas
505 Ripley Road
Sparta, TN 38583
Telephone: (228) 273-5898

PRO SE PLAINTIFF JOHN SCOTT MAAS

/s/ Scott C. Seiler

Scott C. Seiler (Bar #19784)
Devin C. Reid (Bar # 32645)
LISKOW & LEWIS
701 Poydras Street, Suite 5000
New Orleans, LA 70139
Telephone: (504) 581-7979
Telefax: (504) 556-4108

/s/ Kevin M. Hodges

Kevin M. Hodges
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, N.W.
Washington, DC 20005
Telephone: (202) 434-5000
Telefax: (202) 434-5029

/s/ Catherine Pyune McEldowney

Catherine Pyune McEldowney
MARON MARVEL BRADLEY
ANDERSON & TARDY LLC
1201 North Market Street, Suite 900
Wilmington, DE 19801
Telephone: (302) 425-5177
Telefax: (302) 425-0180

/s/ Georgia L. Lucier

Georgia L. Lucier
HUNTON ANDREWS KURTH LLP
600 Travis Street, Suite 4200
Houston, TX 77002
Telephone: (713) 220-4200
Telefax: (713) 220-4285

***ATTORNEYS FOR BP EXPLORATION & PRODUCTION INC.
AND BP AMERICA PRODUCTION COMPANY***

CERTIFICATE OF SERVICE

I hereby certify that on August 21, 2020, the above and foregoing pleading was electronically filed with the Clerk of Court of the United States District Court for the Eastern District of Louisiana by using the CM/ECF System. Notice of this filing will be sent to all counsel of record registered to receive electronic service by operation of the court's electronic filing system. The above and foregoing pleading was also served by certified mail dated August 21, 2020 upon Plaintiff John Scott Maas at the below address:

John Scott Maas
505 Ripley Road
Sparta TN 38583

/s/ Scott C. Seiler
Scott C. Seiler